

# **EXHIBIT "E"**



U.S. Department of Justice

*United States Attorney  
Western District of Pennsylvania*

MCC/vlb

*U.S. Post Office & Courthouse  
700 Grant Street  
Suite 4000  
Pittsburgh, Pennsylvania 15219*

412/644-3500

December 29, 2006

**VIA FACSIMILE AND FIRST CLASS MAIL**

Richard A. Lanzillo, Esquire  
Knox McLaughlin Gornall & Sennett, P.C.  
120 West Tenth Street  
Erie, PA 16501-1461

**RE:   Kenny Hill v. John Lamanna, et al. – C.A.#05-160E  
      Michael Hill v. John Lamanna, et al. – C.A.#03-323E  
      Leslie Kelly v. John Lamanna, et al. – C.A.#03-368E  
      Kevin Siggers v. John Lamanna, et al. – C.A.#03-355E  
      Myron Ward v. John Lamanna, et al. – C.A.#04-11E**

Dear Mr. Lanzillo:

In followup to my e-mail to you and Lorie yesterday, please allow me to again request that you formally respond to the Defendants' First Request for Production which we sent to you on October 3, 2006. In addition, please also respond to the Defendants' First Set of Interrogatories and Second Request for Production of Documents which were forwarded to your office on November 15, 2006. The information that we have requested is overdue.

As you can of course appreciate we need your client's answers to our discovery requests in order to fully and accurately prepare and file our motion for summary judgment, on or before February 1, 2007. Accordingly, please forward your responses to the above discovery (and to the Defendants' Second Set of Interrogatories which are due December 30, 2006) ASAP. Again, because of the very strict deadlines that have been imposed by the Court in this case, be advised that if we do not receive a response to the various discovery requests on or before January 5, 2007, that we will have no choice but to file a Motion to Compel Discovery.

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If you have any questions, please feel free to call me at (412) 894-7337. Thank you for assistance in this matter.

Very truly yours,

MARY BETH BUCHANAN  
United States Attorney

  
MICHAEL C. COLVILLE  
Assistant U.S. Attorney

cc: Douglas Goldring, Esquire